

James P. Taylor
ACLU of Montana Foundation
P.O. Box 9138
Missoula, MT 59807
Telephone: (406) 443-8590
Email: jimt@aclumontana.org

Jon Ellingson
141 North Ave. E
Missoula, MT 59801
Telephone: (406) 546-9084
Email: jonelling@gmail.com

M. Laughlin McDonald
ACLU Foundation, Inc.
2700 International Tower
229 Peachtree St., NE
Atlanta, Ga. 30303
Telephone: (404) 500-1235
Email: LMcDonald@aclu.org

ATTORNEYS FOR THE PLAINTIFFS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

RONALD JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:13-cv-00065-DLC-RKS
)	
THE BOARD OF TRUSTEES OF WOLF)	
POINT, MONTANA, SCHOOL DISTRICT)	
NO. 45-45A, et al.,)	
)	
Defendants.)	

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs move the court for summary judgment pursuant to Rule 56(a), F.R.Civ.P., on their claim that the existing apportionment plan for the Board of Trustees of Wolf Point School

District No. 45-45A is malapportioned in violation of the one person, one vote standard of the equal protection clause of the Fourteenth Amendment. Amended Complaint, Doc. #31, para. 30. The evidence shows there is no genuine dispute as to any material fact and that the movants are entitled to judgment as a matter of law. If summary judgment is granted, Plaintiffs will further move the Court for a remedy for the Fourteenth Amendment violation and that the School District be bailed-in pursuant to Section 3(c) of the Voting Rights Act, 42 U.S.C. § 1973a(c), to coverage under Section 5 of the Act, 42 U.S.C. § 1973c.

Respectfully submitted,

s/James P. Taylor

James P. Taylor
ACLU of Montana Foundation
P.O. Box 9138
Missoula, MT 59807
Telephone: (406) 443-8590
Email: jimt@aclumontana.org

s/Jon Ellingson

Jon Ellingson
141 North Ave. E
Missoula, MT 59801
Telephone: (406) 546-9084
Email: jonelling@gmail.com

s/M. Laughlin McDonald

M. Laughlin McDonald
ACLU Foundation, Inc.
2700 International Tower
229 Peachtree St., NE
Atlanta, Ga. 30303
Telephone: (404) 500-1235
Email: LMcDonald@aclu.org

ATTORNEYS FOR PLAINTIFFS